

1 Name: NELSON ROMERO

2 CBD HEMP, CORPORATION

3 Address: 333 ARROWHEAD PL4 Upland CA 917865 Phone: 909-226-6177

6 Fax: _____

7 In Pro Per

8 2019 FEB 20 PM 11:54
9 CLERK U.S. DISTRICT COURT
10 CENTRAL DIST. OF CALIF.
11 RIVERSIDE
12 BY *P*

13 SCANNED

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA16 CBCHEMP, CORPORATION
17 NELSON ROMERO Plaintiff

18 CASE NUMBER:

19 EDCV19-00315 PSG (KKx)

20 To be supplied by the Clerk of
21 The United States District Court22 v.
23 Saleh Sarwar
24 Positive Roots
25 Sal 2

26 Defendant(s).

27 COMPLAINT

28 Comes Now, NELSON ROMERO, in Propria Persona, Pro Se, in the above captioned matter. The Defendant, Saleh Sarwar, landlord and owner of a retail shopping mall located at 218 East Highland San Bernardino, California 92404 is in violation of California Code 250000 et seq by leasing a commercial space adjacent to my business, a licensed and established CBD Hemp, a Corporation of Corporate Cannabis Company, to an illegal and unlicensed marijuana dispensary. The Plaintiff, NELSON ROMERO, is seeking damages in the amount of \$800,000.00 due to the actions of the landlord by leasing a retail establishment to the illegal marijuana dispensary, Positive Roots, and violating California Code's, Business & Professions Code Sections 26000, et seq. Health & Safety Code Sections 11000, et seq.; 11357, et seq.; 11362.7, et seq.I F S
29 The Plaintiff's actions have also violated CALIFORNIA CIVIL CODE SECTION 1954.25-1954.31 by leasing a commercial retail space to an illegal and unlicensed marijuana dispensary.

30 The defendants careless disregard for the laws and codes of the great state of California has created a dangerous and life-threatening safety concern to the other tenants of the commercial retail establishments. Within thirty (30) days of illegal operation, there have been a total of three burglaries that occurred at the illegal establishment and that has resulted in emotional stress to the plaintiff and employees of CBD Hemp, as well as an enormous loss in revenue.

31 Several attempts have been made by the Plaintiff to resolve the safety concerns that the landlord has created only to be answered with death threats made to the plaintiff as well as the plaintiffs' employees. Please see attached Exhibits as proof of the death threats.

32 In retaliation for requesting that the safety issues that the Plaintiff has created be remedied, the Defendant has threatened to evict the Plaintiff. Please see attached Exhibits as of proof of threats.

33 The Defendant has also violated a clause that was discussed prior to CBD Hemp signing a lease that states

34 In good faith an implied covenant that neither party shall do anything, which will have the effect of destroying or injuring the right of the other party, to receive the fruits of the contract in good faith and fair dealing.

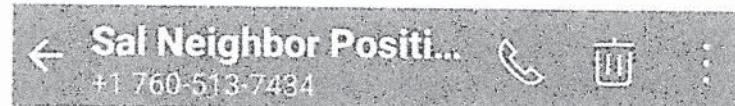
35 A lawsuit has been commenced against you in the above-entitled Court by the Plaintiff. Plaintiff's claim is stated in the Complaint served with this summons. In Order to defend against his lawsuit, you must respond to the complaint by filing an answer by stating your defense in writing and serving a copy to the Plaintiff and or Plaintiff's Attorney within 20 days after service of this summons, excluding the day of service. If you are served outside the state, you will have 60 days after service of this summons. A default judgement may be entered against you without notice.

38 *Jan 22 2019*

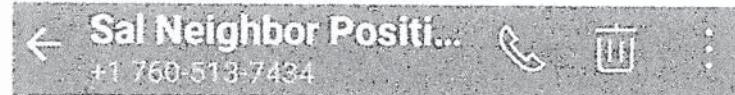
39 FILED

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2



S I want you to know something if I wanted you out of that building I would go there remove you myself it would take me 20 minutes to close you down that's not my interest at all my interest is for you to get your building secure so you don't have



All you have to
do is ask do you
understand me I
don't want to see
no more cops there
bro or no more City
officials

7:16 PM

I dont either i dont
want them to shut
either of us down

7:17 PM

S

But two robberies
in a week bro come
on if you're going to

4

← Sal Neighbor Positi... ☎ 📖 ⏱

S But two robberies
in a week bro come
on if you're going to
be in this business
you have to be a
professional you
have to know what
you're doing

7:17 PM

S If you want me to
help you I will all
you have to do is
ask but please no
bullshit going on

S

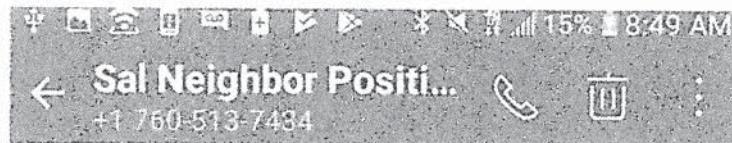
See that now you're acting
right bro if things were the
other way around I would
comply because I would not
want to hurt your business
at all my workers have
family to feed car payments
to make rent to pay on their
houses they're good guys
but they're not going to be
pushed around bro

Dec 29, 2018 7:25 PM

Received

6

REPLY DELETE



S I catch him with a sign out there I'm going to crack his fucking head open, you can run to the cops I don't care if they're not going to help you

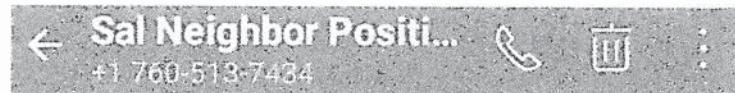
11:10 AM

11:11 AM

So your gonna hurt a innocent man whats wrong with are you ok

7

Im sorry but your disrespecting me to



S And what does that
mean bro I don't
really care about
that what I care
about is that my
business is closed
because of the
way you have your
business setup

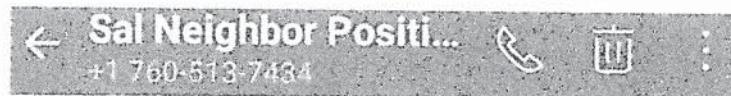
5:20 PM

S So far you cost us
over \$1,000

5:21 PM

S And look how much
money you cost

8



S If you're going to
be in this business
you have to be a
professional

5:24 PM

S What do you think
happens next ? now
the guy you shot
gets his brother his
gang members and
they come after
you ! more trouble

5:25 PM

Can i see you camera

7/18/2018 11:11 AM

So your gonna hurt a
innocent man whats
wrong with are you ok

11:11 AM

Im sorry but your
disrespecting me to
much

11:13 AM

S I'll be there in a
little bit

11:16 AM

S I need to talk to
you and set the
rules for a clinic
and believe me bro

(a

Enter message



← Sal Neighbor Positi...   

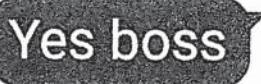
+1 760-513-7434

 Not till Monday
because we don't
have the code to it I
have to call the dealer

Listen do not
connect my
business with your
business do you
understand me!!!!

Will

5:40 PM

5:41 PM  Yes boss

 Sal. You and i know

+1 760-613-7484

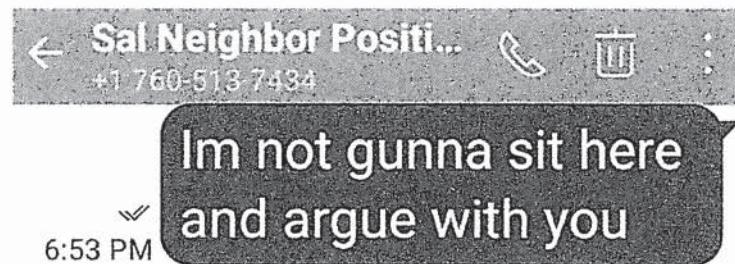
S I need to talk to
you and set the
rules for a clinic
and believe me bro
you going to follow
them

11:17 AM

S I don't know why
you're arguing with
me you're going to
lose all you need
to do is secure
your building and
no more robberies
that's all just do it

Enter message 

12.



S When I see you I
am going to deal
with you harshly,
how dare you make
a comment like
that

6:53 PM

S Go to my shop right
now and look at the
DVR see if they can
get in with a code
it's a pattern code

13.



S And I'm not talking
about sales there's
room for all of us but
you got to do things
right bro you can't be
attracting the city so
much

You don't ever give
me an ultimatum
dude ever I don't think
you know who you're
dealing with

14

← Sal Neighbor Positi... +1 760-513-7434 ☎ 📎 ⚡

S Don't put me to the
test

6:55 PM

S Now you're acting like
a chick

I'm going to deal
with you when I see
you

6:56 PM

Nah i dont want
to talk to you no
more your the worst
person. In the world.

6:59 PM

15.

S Keep on talking you're

+1 760-513-7434

(S) You cannot
advertise like that
on your window do
you understand me
what's wrong with
you man

1:34 PM

(S) Are you sure this is
the route you want
to go bro I told you
a long time ago
don't put me to the
test man

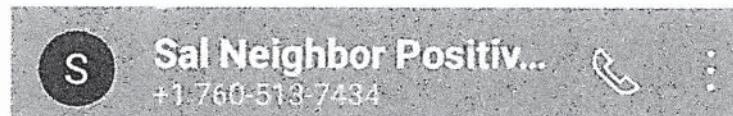
2:03 PM

(S) Bro whv don't you

} 6.

Enter message





And look how much money
you cost the barbershop
do you really think parents
are going to let their kids
go over there anymore? I
wouldn't let my kids knew
that Barbershop anymore all
the shooting and cops and
helicopters

17.

← Sal Neighbor Positi...   
+1 760-513-7434

Don't ever talk to
me like that again

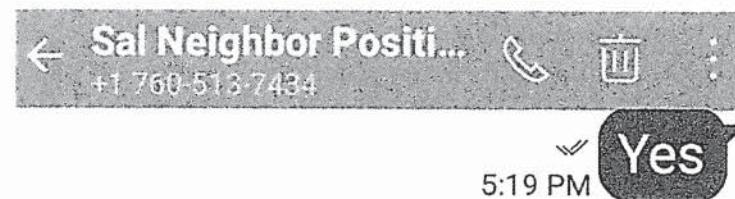
6:48 PM

I think your the one
that sent him. your
suspicious.

6:50 PM

I know who you
are and i always
respected you
but your taking
advantage of me by
the way u talking to
me

(8 .



S Bro don't mention
our name to the
cops at all that's
not cool

5:19 PM

No bro

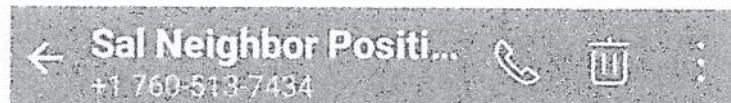
Relax

Im saying he came
early and im sure
your camera saw it

5:19 PM

S And what does that

(q.



S Keep on talking you're
digging yourself
deeper and deeper

You think I want to
get involved in your
mess don't involve
me or my business
or my employees in
your mess dude

7:00 PM

S But I'm going to
deal with you when
I see you but I'll
make you eat those

20.